

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

EK VENTURES I, LLC; DAVID L.
TAYLOR; DAVID L. TAYLOR AND
VIRGINIA L. TAYLOR as TRUSTEES
FOR THE TAYLOR FAMILY
REVOCABLE TRUST; and
FLEXTRONICS INTERNATIONAL
LTD.,

Plaintiffs,

v.

JAMES R. BARTLETT and Z.B.R.
PUBLICATIONS, INC.,

Defendants

and

JAMES R. BARTLETT,

Third-Party Plaintiff,

v.

GLOBALWARE SOLUTIONS, INC.,
ANTHONY RUDSTON and
BRADLEY A. JAY,

Third-Party Defendants

No: 1:03-CV-12506-NMG

JOINT MOTION TO EXTEND SCHEDULING ORDER

Pursuant to Fed. R. Civ. P. 16, Plaintiffs EK Ventures, I, LLC et al., Defendant Z.B.R. Publications, and Third-Party Defendants GlobalWare Solutions, Inc., Anthony Rudston, and Bradley A. Jay, (collectively the “Moving Parties”)¹ hereby move to extend the Scheduling

¹ Defendant James R. Bartlett has not joined this motion.

Order deadlines in the above-captioned action by three months, as set forth in the accompanying

Memorandum of Law.

Respectfully submitted,

EK VENTURES I, LLC; DAVID L.
TAYLOR; DAVID L. TAYLOR and
VIRGINIA L. TAYLOR as trustees for the
TAYLOR FAMILY REVOCABLE TRUST;
and FLEXTRONICS INTERNATIONAL
LTD.,

Z.B.R. PUBLICATIONS, INC.,
GLOBALWARE SOLUTIONS, INC.,
ANTHONY RUDSTON, and BRADLEY
A. JAY

By their attorneys,

By their attorneys,

/s/ Douglas R. Roach, DMR by permission

/s/ David M. Ryan

Douglas R. Roach, WSBA#22127
BBO#558612 *Admitted Pro Hac V*
GROFF MURPHY TRACHTENBERG
& EVERARD
300 East Pine Street
Seattle, Washington 98122
(206) 628-9500

Melissa Bayer Tearney,
David M. Ryan, BBO#644037
NIXON PEABODY LLP
100 Summer Street
Boston, Massachusetts 02110
(617) 345-1000

Dated: December 23, 2004

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 7.1

Pursuant to Local Rule 7.1, I certify that on December 16, 2004, I conferred with Thomas S. FitzPatrick, counsel for Defendant James R. Bartlett, in an attempt to resolve the issues raised in this motion, but was unable to do so. All other parties assent to this motion.

/s/ David M. Ryan

David M. Ryan

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each party electronically on December 23, 2004

/s/ David M. Ryan

David M. Ryan